(Caption of Case) Duke Energy Progress, Inc.'s Integrated Resource Plan (IRP))	PUBLIC SERVICE OF SOUTH COVER DOCKET NUMBER: 2013	E COMMISSION CAROLINA	
(Please type or print)	ith II	SC Bar Number: 69592		
Submitted by: Robert R. Smith II			331-1091	
Address: Moore & Van Aller	n, PLLC	Fax: 704-378-		
100 N. Tryon Street	t, Suite 4700	Other:		
Charlotte, NC 28202		Email: robsmith@mvalaw.o	iw.com	
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BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2013-8-E

IN THE MATTER OF:)	
)	PETITION TO INTERVENE
Duke Energy Progress, Inc.'s)	BY NUCOR STEEL -
Integrated Resource Plan (IRP))	SOUTH CAROLINA
	ì	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

- 1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, Inc. ("DEP") (formerly known as Progress Energy Carolinas, Inc. ("PEC") and Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
- 2. This docket has been established to review DEP's 2013 Integrated Resource Plan ("IRP") which DEP submits annually "as a planning document to ensure that it can reliably and affordably meet the energy needs of its customers well into the future." IRP at 4. Furthermore, in addition to the traditional resource plan, this year DEP has included an "alternative Joint Planning Scenario that examines the benefits of a coordinated energy and capacity expansion plan with Duke Energy Carolinas." *Id.* In Order No. 2012-95, the Commission determined that the IRP process constitutes a

proceeding under Section 103-804(Q) of the Commission's regulations, and that intervention in these proceedings would be permitted.

- 3. As a large industrial customer of DEP, Nucor has an interest in the topics addressed in the IRP, including DEP's current long-term energy and demand forecasts, DEP's plans to meet its future resource needs, and the effect of possible joint planning scenarios with Duke Energy Carolinas. Accordingly, Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. Since 1987, Nucor has actively participated in many previous DEP, PEC and CP&L fuel and rate proceedings before this Commission. Nucor has not yet determined what its position may be in this proceeding.
- 4. Nucor's mailing address is:

Nucor Steel – South Carolina P.O. Box 525 Darlington, SC 29532

5. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

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Charlotte, North Carolina 28202
(704) 331-1091 Phone
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robsmith@mvalaw.com

Counsel for Nucor Steel - South Carolina

Dated: November 22, 2013

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2013-8-E

IN THE MATTER OF:)	
)	
Duke Energy Progress, Inc.'s)	CERTIFICATE OF SERVICE
Integrated Resource Plan (IRP))	
)	

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, fax or Federal Express on this the day of November, 2013:

Timika Shafeek-Horton, Esq. *Progress Energy Carolinas, Inc.* 550 South Tryon Street, DEC45A Charlotte, NC 28202

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Robert R. Smith, II